

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

Richmond Division

2020 DEC -3 A 9:30

FEDERAL COURT
EAST VIRGINIA

Dr. Marla Faith Crawford, pro se

Case No.

3:20cv923

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

School Board For Richmond City
David Corrigan/Trading In Partnership as Wells, Claytor,
Corrigan & Wellman

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Dr. Marla Faith Crawford		
Address	6523 South Stevens Hollow Drive		
	Chesterfield	Va	23832
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Chesterfield		
Telephone Number	804-397-4480		
E-Mail Address	eliteeducationalconsulting9@gmail.com		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	School Board For Richmond City		
Job or Title (if known)	Attn: Angela Wilson		
Address	301 North 9th Street, 17th Floor		
	Richmond	Va	23219
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Richmond City		
Telephone Number	(804) 780-7716		
E-Mail Address (if known)	awilson9@rvaschools.net		
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

Defendant No. 2

Name	David Corrigan/Wells, Claytor, Corrigan & Wellman		
Job or Title (if known)	Partner		
Address	4951 Lake Brook Dr #100		
	Glen Allen	Va	23060
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number	804-747-5200		
E-Mail Address (if known)	dcorrigan@hccw.com		
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Defendant No. 3

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐

Individual capacity

☐

Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐

Individual capacity

☐

Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐Federal officials (a *Bivens* claim)☒

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

ADA

504

IDEA

Equal Access (14th Amendment)

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

The events resulted since the Plaintiff has been advocating for students with disabilities and testified in administrative hearings against the School Board for Richmond City. This was initially stated by Dr. Anthony Walker, Former Director of SPED for the School Board. The School Board filed a civil claim against Plaintiff because she filed a complaint against M. York of Harman, Claytor, Corrigan & Wellman as stated by and filed by David Corrigan on 3/5/2020 (paraphrasing) [NOTE: Act of Retaliation].

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?
Richmond City of Virginia

- B. What date and approximate time did the events giving rise to your claim(s) occur?
03/13/2018
01/08/2020
On-Going

- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*
Plaintiff (black female) was denied equal access to engage in assessment because she is an advocate, testified against the School Board for Richmond City (RPS) in 2018 as an act of retaliation and discrimination [this did not happen to Suzanne Starseed (white female) that also testified]. Plaintiff had to file a complaint with the US Dept. of Education in order to conduct assessments for RPS. RPS facilitated 116 hours of work, refused to pay and paid attorneys more 2.5 times the amount plaintiff was willing to settle the debt for. RPS had to provide the US Dept. of Education with corrective action by 12/04/2018. Plaintiff filed complaint against M. York in 2019 for excessive legal fees and another complaint in 2020 for soft deferamtion. On 1/8/2020, RPS filed a lawsuit against Plaintiff for \$1250 of its over \$31000 legal fees and seeking legal fees of over \$6500 for filing the \$1250 claim. On 3/5/2020, David Corrigan, partner of Harman, Claytor, Corrigan,& Wellman, indicated that the reason his firm filed the lawsuit for RPS was because of the complaint filed against M. York (lawyer with his law office and legal representation for RPS) (paraphrasing) [3/5/2020 Court Transcript]. David Corrigan advised this action. [NOTE: M. York is an independent, contracted attorney for the School Board for Richmond City.]

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Acts of Discrimination

Acts of Retaliation

Denial of Equal Access

Stress

Income Lost

Out-of-pocket Expenses

210 Administrative Hours Exhausted To Addressing These Matters

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

\$200,000 (Punitive Damages)

\$26,900 (Income Lost for 116 Hours Facilitated By Agents of School Board for Richmond City)

\$183.36 (Administrative Cost for Professional Activities at Request of Agent of School Board For Richmond City)

\$11,550 (Administrative Costs Addressing Matters/Issues)

\$1,800 (Out-of-Pocket Expenses)

Fees and Cost Associated with this Action

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 01/02/2020

Signature of Plaintiff

Printed Name of Plaintiff


Dr. Marla Faith Crawford

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address